

IN THE DISTRICT COURT OF THE UNITED STATES  
FOR THE DISTRICT OF NEW MEXICO

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	
vs.	)	Case No.: 13 CV 0021 MCA/LFG
	)	
Funds in the Amount of:	)	
\$427,456.00 from Wells Fargo Bank Account No.	)	
**6376, \$271,986.00 from New Mexico Educators	)	
Federal Credit Union Account No. **7830-5,	)	
\$75,089.60 from Wells Fargo Bank Account No.	)	
**3236, \$32,367.24 from Bank of Albuquerque	)	
No. **4672, \$30,985.00 from New Mexico	)	
Educators Federal Credit Union Account No.	)	
**3470-2, and \$4,000.00 from Bank of	)	
Albuquerque Account No. **8878,	)	
	)	
Defendants,	)	
	)	
And	)	
	)	
REZA ELLA,	)	
Claimant.	)	

**VERIFIED CLAIM AND STATEMENT OF**  
**INTEREST OF REZA ELLA**

COMES NOW Reza Ella by his attorney, Robert J. Gorence of Gorence & Oliveros, P.C., and hereby respectfully submits this verified claim and statement of interest in and to the above referenced property that is the subject of this proceeding and states as follows:

1. The government filed its Verified Complaint for Forfeiture *in rem* on January 9, 2013, against the following property in which the government asserts that Reza Ella holds an interest:

Funds in the Amount of:

- a. \$427,456 from Wells Fargo Banc Account No. \*\*6376;
- b. \$271,986 from New Mexico Educators Federal Credit Union Account No. \*\*7830-5;
- c. \$75,089.60 from Wells Fargo Bank Account No. \*\*3236;
- d. \$32,367.24 from Bank of Albuquerque Account No. \*\*4672;
- e. \$30,985 from New Mexico Educators Federal Credit Union Account No. \*\*3470-2; and
- f. \$4,000 from Bank of Albuquerque Account No. \*\*8878.

2. On or about January 16, 2013, claimant Reza Ella was served with a copy of the Verified Complaint for Forfeiture *in rem* and the notice of complaint for forfeiture against the above described property.

3. On January 18, 2013, attorney Robert J. Gorence entered his appearance as counsel for Reza Ella.

4. On February 12, 2013, attorney Jason Bowles entered his appearance as co-counsel for Reza Ella.

5. Mr. Ella hereby asserts his interest in said property.

**Claim of Interest**

Funds in the Amount of:

- a. \$427,456 from Wells Fargo Banc Account No. \*\*6376;
- b. \$271,986 from New Mexico Educators Federal Credit Union Account No. \*\*7830-5;
- c. \$75,089.60 from Wells Fargo Bank Account No. \*\*3236;
- d. \$32,367.24 from Bank of Albuquerque Account No. \*\*4672;
- e. \$30,985 from New Mexico Educators Federal Credit Union Account No. \*\*3470-2; and
- f. \$4,000 from Bank of Albuquerque Account No. \*\*8878.

6. The above described property is property lawfully owned by claimant Reza Ella and, as such, Mr. Ella hereby asserts an ownership interest in said property that is the subject of

this action for civil forfeiture. Further, claimant demands the return of said property and the right to defend his interest in said property in this action.

Respectfully submitted,

/s/ Robert J. Gorence 02/15/13  
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And

Jason Bowles  
P.O. Box 25186  
Albuquerque, NM 87125-5186  
Phone (505) 217-2680

*Attorneys for Claimant Reza Ella*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on the 15<sup>th</sup> day of February, 2013, I filed the foregoing electronically through the CM/ECF system, which caused the following parties or counsel to be served by electronic means, as more fully reflected on the Notice of Electronic Filing:

Stephen R. Kotz, Attorney for United States  
(steve.kotz@usdoj.gov)

Cynthia L. Weisman, Attorney for United States  
(cynthia.weisman@usdoj.gov)

s/ Robert J. Gorence 02/15/13  
Robert J. Gorence

**VERIFICATION**

State of New Mexico     )  
  ) ss:  
County of Bernalillo     )

**Reza Ella**, being first duly sworn, deposes and states that he has read the foregoing Verified Claim, and that the statements contained therein are true and correct to the best of his knowledge, information, and belief.



Reza Ella

The foregoing was acknowledged before me this 14<sup>th</sup> day of February, 2013, by Reza Ella.



Notary Public

